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Federal Public Defender
2 State Bar No. 11479
NISHA BROOKS-WHITTINGTON
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6 Attorney for DAMON BOSWELL

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 DAMON BOSWELL,
15 Defendant.

Case No.: 2:13-cr-183-JAD-CWH

UNOPPOSED MOTION AND
~~PROPOSED~~ ORDER TO MODIFY THE
CONDITIONS OF PRETRIAL RELEASE

16 COMES NOW THE DEFENDANT, DAMON BOSWELL, by and through counsel,
17 RENE L. VALLADARES, Federal Public Defender, and NISHA BROOKS-WHITTINGTON,
18 Assistant Federal Public Defender, counsel for Mr. Boswell, and respectfully requests that the
19 conditions of Mr. Boswell' release be modified to include permission to travel within the
20 Continental United States.

21 This Stipulation is entered into for the following reasons:

22 1. On October 10, 2013, Mr. Boswell appeared for his initial appearance and
23 arraignment and plea before the Magistrate Judge Ferenbach. He pleaded not guilty to the charges
24 alleged in the indictment. Mr. Boswell was released on a personal recognizance bond with pretrial
25 services supervision. Mr. Boswell's conditions of release restrict his travel between the Central
26 District of California and Nevada.

27 2. Mr. Boswell is currently employed as an independent business representative
28 with American Community Network ("ACN"). ACN focuses on marketing services to different

1 companies. Mr. Boswell's current employment requires travel for leadership meetings, sales, and
2 conferences. In fact, ACN is hosting a convention in Charlotte, North Carolina from February 14-16,
3 2014, that Mr. Boswell would like to attend.

4 3. Mr. Boswell shares a close relationship with his father. His father is
5 approximately 67 years old and lives in San Diego, California. As a result of Mr. Boswell's travel
6 restriction, he is unable to visit his father. Mr. Boswell's father is diabetic and suffers from other
7 health ailments. Mr. Boswell would like to occasionally visit his father and assist him with
8 transportation to doctor's appointments and with maintaining his home.

9 4. Mr. Boswell has remained in compliance with all conditions of pretrial
10 supervision and respectfully requests permission to travel within the Continental U.S. for work
11 purposes and to visit with his father.

12 5. Pretrial Services Officers, Zack Bowen and Camron Pitcher from the Central
13 of California's Pretrial Services Office, have no opposition to the request.

14 6. The government also has no opposition to this request.

15 7. Mr. Boswell therefore respectfully request that the pretrial supervision
16 conditions be modified to permit his travel within the Continental U.S. for work related purposes and
17 to visit his father.

18
19 DATED this 30th day of January, 2014.

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21 RENE L. VALLADARES
Federal Public Defender

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23 By: /s/ Nisha Brooks-Whittington
NISHA BROOKS-WHITTINGTON,
24 Assistant Federal Public Defender
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAMON BOSWELL,

Defendant.

Case No.: 2:13-cr-183-JAD-CWH

~~PROPOSED ORDER TO MODIFY~~
PRETRIAL CONDITIONS

ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the pretrial release conditions of the defendant be modified to permit travel within the Continental U.S. for work related purposes and to visit his father.

DATED 30th day of January, 2014.


UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of the Law offices of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on January 30, 2014, I served an electronic copy of the above and foregoing **UNOPPOSED MOTION AND PROPOSED ORDER TO MODIFY THE CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
CRISTINA BROWN
Assistant United States Attorneys
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101

/S/ Nancy Vasquez
Nancy Vasquez, Legal Secretary to
NISHA BROOKS-WHITTINGTON,
Assistant Federal Public Defender